

GIBBONS, DEL DEO, DOLAN, GRIFFINGER & VECCHIONE

A PROFESSIONAL CORPORATION

EPA Region 5 Records Ctr.



313181

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March 17, 2005

VIA EXPRESS MAIL

Vesenia Ortiz
Paralegal
U. S. Environmental Protection Agency,
Region I
Office of Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604-3590

**Re: Avon Products, Inc. 104(e) Response - Lake Calumet Cluster Site Superfund
Site in Chicago, Illinois**

Dear Ms. Ortiz:

This firm represents Avon Products, Inc. (Avon), 1345 Avenue of the Americas, New York, New York in connection with the United States Environmental Protection Agency's (EPA) Request for Information pursuant to the Section 104(e) Comprehensive Environmental Response Compensation and Control Act (CERCLA) in the above matter. The Request for Information, which was addressed to Avon and concerns Avon's relationship, if any, with the Lake Calumet Cluster Site Superfund Site in Chicago, Illinois.

Avon has conducted a thorough review of its environmental records and will continue its records search and seek to interview former employees. However, other than the documents attached to the Request, Avon has found no other documents.

These responses are provided without any admission of liability on Avon's part.

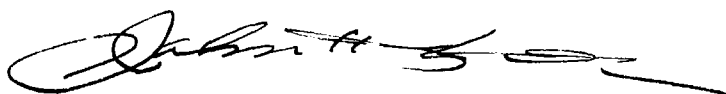
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GIBBONS, DEL DEO, DOLAN, GRIFFINGER & VECCHIONE

Vesenia Ortiz
March 17, 2005
Page 2

As stated above, Avon will continue to search its files for any other information responsive to this 104(e) request. If any additional responsive information is discovered, Avon will produce this information to the EPA. If you have any questions, please let me know.

Very truly yours,

A handwritten signature in black ink, appearing to read "John H. Klock", with a long horizontal flourish extending to the right.

John H. Klock

JHK/kem

Enclosures

cc: Timothy Gilman
Michael Hercek

U.S. ENVIRONMENTAL
PROTECTION AGENCY

MAR 21 2005

OFFICE OF REGIONAL
COUNSEL

AVON PRODUCTS, INC.

**RESPONSE TO UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY INFORMATION REQUEST DATED
DECEMBER 17, 2004 RELATED TO LAKE CALUMET CLUSTER SITE,
CHICAGO ILLINOIS**

Dated: March 17, 2005

1. Michael Hercek, Senior Manager, Environmental Affairs Avon Products, Inc. 1345 Avenue of the Americas, New York, New York (212) 282-5093

Paul Ryan, Environmental Engineer, Avon Products, 6901 Golf Road, Morton Grove, Ill. 60053, (847) 470-5535

2. All files pertaining to the Environmental Records of Avon at its Morton Grove, Ill. Facility were examined. Files at Avon's World Headquarters were examined. The result of the search are the following documents.

- (1) Memorandum from J.Z. Gal to File dated March 24, 1983 (copy attached)
- (2) Memorandum from J.Z. Gal to File dated March 23, 1983 (copy attached)
- (3) Letter undated from Richard J. Hollander on behalf of American Incarceration (copy attached)
- (4) Letter dated February 24, 1983 from Karen Petite to Avon Products (copy attached)
- (5) Memorandum of July 15, 1983 from A.A. Rice to D.W. Meyers (copy attached)
- (6) Letter of June 24, 1983 from John Z. Gal to (copy attached) Ron Miller itemizing manifests from Avon files.
- (7) Memorandum dated June 8, 1983 from R. Miller to N. Camera (Avon In-house attorney) and others re meeting held on June 7, 1983. (A claim of attorney-client privilege is made as to this document).
- (8) Handwritten Notes undated 3-pages (copy provided)
- (9) Handwritten Notes undated 6-pages, numbered (copy provided)
- (10) Letter of April 19, 1983 from Raymond W. Bock of Chemical Waste Management (copy provided)
- (11) Letter of May 16, 1983 FROM Raymond Bock of chemical Waste Management to Avon Products (copy provided)
- (12) Letter of March 14, 1983 from John Z. Gal to Ron Miller re Hazardous Waste Contracts (copy provided)
- (13) Memorandum on Alburn Waste Disposal dated March 14, 1983 (from J.Z. Gal to A.A. Rice (copy provided)

- (14) Memorandum of March 4, 1983 from J.Z. Gal to A.A. Rice re Alburn - Drum Disposal with attached list of drums at the site based on site survey (copy provided)
- (15) March 1, 1983 memorandum from J.Z. Gal to File re Alburn - Drum Disposal (copy provided)
- (16) February 28, 1983 memorandum to file from J. Z. Gal re: SCA Chemical Services.
- (18) February 24, 1983 memorandum to file from J.Z. Gal re: Alburn - Drum Disposal (copy attached)
- (19) February 23, 1983 memorandum to file from J.Z. Gal re: Alburn Disposal (copy attached)
- (20) February 18, 1983 memorandum from J.Z. Gal to File re Alburn, Inc. (copy attached)
- (21) Avon Special Waste Manifest 0623360 dated 10/16/82 (copy attached)
- (22) Avon Special Waste Manifest 0623361 dated 10/16/82 (copy attached)
- (23) Letter dated February 24, 1983 from EPA Karen Petite to Avon Products (copy attached)
- (24) Mandated letter from Richard Hallendar to Avon Products (copy attached)
- (25) Letter from Hank Mendoza to John Gal dated February 16, 1983 (copy attached)
- (26) Letter to Karen Petite from John Z. Gal dated March 25, 1983 (copy attached)
- (27) Memorandum of March 24, 1983 from J.Z. Gal to file (copy attached)
- (28) Memorandum of March 23, 1983 from J.Z. Gal to A.A. Rice (copy provided)
- (29) One-page Ledger sheet handwritten (undated) (copy provided)

3. It appears that a former employee, John Z. Gal, would have more detailed information. Avon Products has no information as to his whereabouts, but will continue to try and locate him, if still alive.

4. The only person at Avon with such knowledge is John Z. Gal identified in Response No. 1. All other persons appear to have learned through John Gal.

TO: File-Waste Disposal
FROM: J. Z. Gal *JZG*
DATE: March 24, 1983
SUBJECT: Alburn-Drum Disposal

On Friday, March 18, 1983, Gary Braeckel of the Illinois Assistant Attorney General's office was contacted in reference to the drummed waste staged at the Alburn Incinerator.

Mr. Braeckel stated that the existing owner of the previous Alburn Incinerator, American Incinerator, has submitted a proposal to the city for the removal of the drummed waste from the Alburn site.

This proposal consists of utilizing one waste disposal contractor for the removal and disposal of all the waste at the Alburn site, thus making the generator harmless and free of liability. The contractor recommended for this waste removal is Chemical Waste Management Inc.

Mr. Braeckel pointed out that due to the delays encountered by American Incinerator, the 30 day compliance time set for the removal of the drummed waste will probably be lifted. At present no decision had been made as to the acceptance of this proposal.

cc: A. A. Rice

TO: A. A. Rice
FROM: J. Z. Gal *JZG*
DATE: March 23, 1983
SUBJECT: ALBURN DRUM DISPOSAL

On Wednesday, March 23, 1983, Cliff Gould of the IEPA in Maywood, Illinois was contacted in order to review the drum count at the Alburn Incinerator. Mr. Gould pointed out that he no longer had the original manifests from the waste shipped to the Alburn site. These manifests were returned to the new site owner, American Incinerator. Mr. Gould suggested contacting Don Gallay from the City of Chicago, Department of Consumer Services, in order to review this drum count discrepancy.

Mr. Don Gallay pointed out that since American Incineration, Inc., is proposing to remove all waste using one waste hauling contractor and that there were some difficulties with scheduling, the 30 day waste removal deadline given to the generators by the Department of Consumer Services has been lifted. As to the error in drum count, Mr. Gallay recommended dealing directly with American Incinerator, since they had issued the original drum count.

Rich Hollander, of American Incinerators, Inc. was contacted later that morning. Mr. Hollander would not give out any information pertaining to the drummed waste staged at the Alburn site. Instead, Mr. Hollander requested that a letter be mailed to himself at which time he would address the situation.

Presently there is still the difficulty in accounting for all of Avon's drummed waste at the Alburn site. A letter documenting the conversation with Mr. Gallay will be drafted. Also, a letter will be sent to Kay Haas, the owner of American Incinerator, requesting information dealing with the drum count.

JZG/mlw

cc: D. W. Meyers

R. Miller - Suffern

Hollander and Hollander

ATTORNEYS AT LAW

33 NORTH LA SALLE STREET - 29TH FLOOR

CHICAGO, ILLINOIS 60602

(312) 346-5570

HOWARD D. HOLLANDER

RICHARD J. HOLLANDER

PETER C. RESNER

GARY P. HOLLANDER

SYDNEY W. HOLLANDER

(1934-1982)

AVON PRODUCTS INC.,
6901 GOLF RD
MORTON GROVE IL 60053

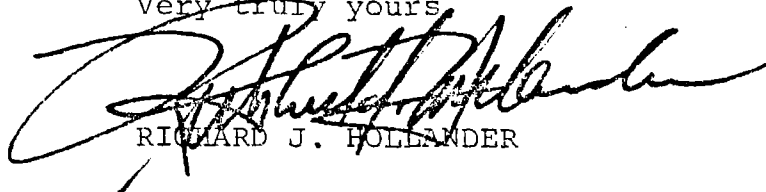
Gentlemen:

We represent American Incineration, Inc. We know you have received a letter from the City of Chicago regarding the removal of your material from the former Alburn site. After many meetings and gathering information, our client has found the only safe, efficient way to handle removal of the large volume of both drum and bulk waste is to have one company handle the clean up from start to conclusion. We are in the process of formulating such a plan with Chemical Waste Management, Inc. The plan contemplates court approval as well as the approval of the State and City regulatory agencies involved. Also proposed are necessary documents for generators to provide an appropriate conclusion to this unfortunate situation. It is our client's intention to submit this plan within the next fourteen (14) days. We believe this plan will not only be safe and efficient, but will also be an economical means of removing and destroying your waste.

We have contacted the City of Chicago regarding their demand to remove your waste within thirty (30) days. The City has agreed to allow adequate time for an orderly solution to this problem.

In the past, our client has permitted generators on site to inspect their material; however, this practice will not continue. The potential liability and concern for the safety of your personnel prohibits any further site inspections at this time. We are contemplating a generators meeting around the first of next month and will notify you by mail. Because of the enormous amount of time required returning phone calls, we are asking further communications be restricted to written memos or letters. We are looking forward to your continued cooperation in resolving this difficult problem.

Very truly yours,



RICHARD J. HOLLANDER

RJH/pn



City of Chicago
Jane M. Byrne, Mayor

Department of
Consumer Services

Karen Petite
Commissioner

City Hall, Room 808
121 North LaSalle Street
Chicago, Illinois 60602
(312) 744-4091

CERTIFIED MAIL RETURNED RECEIPT REQUESTED

February 24, 1983

RE: 2200 E 119th St
Chicago, IL 60617
(Formerly Alburn, Inc)

Avon Products Inc.
6901 Golf Rd
Morton Grove, IL 60053

By virtue of a court order, we have obtained a list of those companies which have illegally deposited waste materials on the above referenced premises in violation of Chapter 17, Artical 6.2 of the Municipal Code of Chicago. The records indicated that your company has approximately 160 drums of liquid waste which are presently stored on the premises.

You are hereby directed to remove the deposited material within 30 days after receipt of this letter. We will require prior notification of the scheduled removal together with planned destination and the name of the hauler. To make the necessary arrangements, you should contact the present occupant of the site, K. Haas, American Incineration Company at 312-346-5570.

An inspection of the drum inventory indicates that some of the drums may be in a deteriorated condition requiring the use of overpacks. Failure to comply with this directive will result in a citation issued to your company for violation of the Municipal Code.

If further information is required you may contact Mr. Don Gallay, Director of Engineering and Enforcement, of this department at 312-744-3210.

Sincerely,

Karen Petite
Commissioner

KP:DG:lt

cc: USEPA Region V
IEPA
Attorney General, State of Illinois
State Environmental Dept of Generator State of Origin
American Incineration, Inc.

P 464 760 781

TO: D. W. Meyers
FROM: A. A. Rice
DATE: July 15, 1983
SUBJECT: ALBURN SITE CLEAN-UP

A meeting was held on Thursday, July 14, by the generator group steering committee with the U.S. E.P.A. regional coordinator, Robert Leininger, who is the counsel assigned to this case, concerning the current situation at Alburn.

Bob started the meeting by informing the generator group that the Alburn site had had an explosion the previous week. That an investigation was held by the Illinois and U.S. E.P.A. It was decided that this should become an emergency clean-up operation coordinated by the U.S. E.P.A. under the auspices of the super fund. A contract was let to Mid-America Environmental Services for a price in the \$600,000+ range.

We were briefed by Bill Simes, the on-scene coordinator for the clean-up, on the timetable and actions to be taken by the U.S. E.P.A. He made it very clear to us from the onset that this was an emergency action funded by the super fund, that the U.S. E.P.A. had taken control of the site, and that all actions taken would meet the specifications and regulations of the E.P.A.

At 10:30, July 15, the E.P.A. will conduct a meeting with the local governmental offices to explain the actions to be taken and to clarify emergency contingencies in case of mishap. The meeting will include the police, fire and medical authorities. At 1:00, July 15, a press conference will be held on site to brief local media on the actions to be taken. We were assured that no names of generators will be given, that the E.P.A. would do everything in their power to keep the information confidential.

During the evening hours of July 15, the clean up process will commence. River water will be pumped over all of the drums in an attempt to cool the content temperature of the drums so that pressure might be relieved more safely. After the pressure has been relieved, then a programmed clean-up will begin. It is estimated this process will take approximately 12 weeks.

All drums will be sampled. All bulk containers will be sampled. After the test results have been received, all drum stock will be pumped from the drums into tanker trucks. The bulk will be moved to the S.C.A. incineration site adjacent to Alburn for destruction. The bulk containers will then be pumped and the stock removed to the same site for incineration. All underground tanks will be dug up, cut up, and scraped. Samples will be taken of the surface ground for possible contamination. A decision will be made at that time as to what further surface clean up will be required.

After Bill Simes briefing, the generators were invited to ask questions and to voice their concerns. It was requested by the generator group that their documentation, i.e. manifests, analytical data, etc., be accepted in lieu of drum sampling if the data could be identified with a specific drum. Bill accepted this as an alternative in order to help us cut the cost of the site clean up.

The generators will be allowed on site to assist in drum verification. They must, however, adhere to all of the safety precautions set down by the on-site coordinator. All safety and protective equipment must be worn.

The emergency action will address surface clean up only. Once this portion of the clean up has been completed, a decision will be made as to what other action should be taken. Once the total cost has been assessed, the E.P.A. will contact the generators informing them of their assessed contribution. We were unable to get any clear idea of what these costs might be, other than the amount of the contract that had been let.

The generators expressed the concern that they would have to pay the entire bill and that the present owners and previous owners would not have to contribute anything, thereby, receiving a clean operable site, which will afford them the opportunity to make enormous profits while incurring no cost of their own. Bob was empathetic to our position and told us he would definitely take this into consideration when the costs were assessed. In addition, he asked if we had any knowledge of malfeasance or fraud on the part of the present owners or previous owners, he would forward this information to the Department of Justice for their action.

John Gal, Pat Payne from the Q.A. lab and myself will be going to Alburn the early part of next week to participate in the identification process.

AAR/mlw

cc: R. Miller
J. Z. Gal





Avon Products, Inc., 6901 Golf Road, Morton Grove, Illinois 60053

June 24, 1983

Mr. Ron Miller
Avon/Suffern

Dear Ron,

As per our phone conversation, below please find a listing of the waste shipments sent to the Alburn Incinerator during the 1982 season. The Shipping Authorizations and manifests are as per our files. The manifest from the shipment of August 25, 1982 has been misplaced and a formal request has been made to the new owners of the Alburn site (Professional Construction Company) for any information regarding all shipments forwarded to the Alburn facility.

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| 10/26/82 | 13929 | Wst. Cos. | 43 (55) | 0623360 |
| | | | 14 (30) | |
| 10/08/82 | | Wst. Alc. | 0990 Gal. | 0623347 |
| 08/25/82 | 13913 | Wst. Cos. | 65 (55) | |
| 08/19/82 | 13909 | Wst. Alc. | 0935 Gal. | 0673862 |
| 04/26/82 | 13073 | Wst. Alc. | 1800 Gal. | 0597699 |

Should you have any questions or require any further information, please do not hesitate to contact me at Ext. 5622. Thank you.

Sincerely,

John Z. Gal
Building & Grounds Supervisor

JZG/mlw

cc: A. A. Rice

~~11/11/11~~



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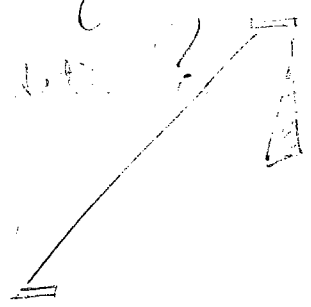
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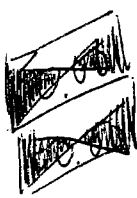
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67-73

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WAST WATER ? WAST WATER TREATMENT



Chemical Waste Management, Inc.
Environmental Remedial Action Division
150 W. 137th Street
Riverdale, Illinois 60627
312/841-8600

April 19, 1983

Avon Products Inc.
6901 Golf Road
Morton Grove, Illinois 60053

ATTN: ENVIRONMENTAL DIRECTOR

Gentlemen:

You recently received a letter from the Department of Consumer Services of the City of Chicago in reference to shipments of waste your company made to Alburn, Inc. The facility is now in the hands of new owners, pursuant to court orders, however, most of the material that was shipped to the Alburn facility over the past 24 months still remains there and is in need of further and final treatment and/or disposal.

Chemical Waste Management, Inc. at the request of the new operators of the site, American Incineration, Inc., has prepared a complete site mitigation plan to address the final removal and disposal of all drums, visually contaminated soil, sludges and liquids that are currently on the site. The advantage of having our company accomplish the entire task are:

1. By consolidating the entire project under one contractor, there is an economic advantage that will be passed along to the Generators in the form of lower costs.
2. By having Chemical Waste Management perform the entire project, it provides a single source responsibility and participating Generators would receive a complete indemnification from our company against future liabilities for wastes removed from the site.

The precise meeting location has not yet been determined but it will be held in the Chicagoland area. We will establish and communicate a specific meeting place once we have determined the total number of Generators that will attend the meeting. Therefore, in order to set the meeting place, we would appreciate your confirming your company's attendance by mailing the enclosed postcard no later than April 29. We will then communicate to participating companies the location and time of the meeting.

We have completed our site mitigation plan and have costed the work as specified. We have also received records of waste shipments into the Alburn facility and have a pro rata contribution for each Generator based upon the

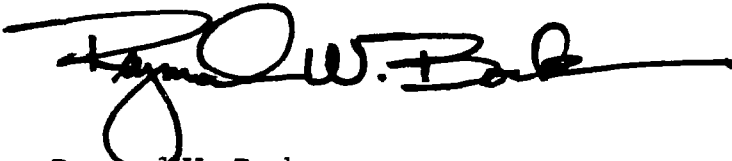
volume of waste currently on site and/or shipped to the site by each Generator as compared to the total volume of waste. That information will also be provided to you at the meeting.

We would like to schedule a meeting of all interested Generators the week of May 16 in order to discuss our project approach in detail and to answer any questions your company may have.

If you should have any questions please contact me at the above telephone number.

Very truly yours,

CHEMICAL WASTE MANAGEMENT, INC.

A handwritten signature in black ink, appearing to read "Raymond W. Bock", with a large, stylized loop at the end.

Raymond W. Bock
Program Director - Superfund Activities

RWB:mah



Chemical Waste Management, Inc.

Environmental Remedial Action Division
150 W. 137th Street
Riverdale, Illinois 60627
312/841-8600

May 19, 1983

Avon Products, Inc.
6901 Golf Road
Morton Grove, Illinois 60053

ATTN: Environmental Director

Gentlemen:

With regard to the letter Chemical Waste Management, Inc. sent your company on April 19, 1983 pursuant to the clean-up of the Alburn, Inc. facility, as you know, we had tentatively scheduled a meeting of the generators for the week of May 16, at which we would present our clean-up program and apportioned costs. That meeting was predicated upon receiving positive responses to attending the meeting from the group of generators who had shipped waste to the Alburn Facility. As you are probably already aware, the meeting tentatively scheduled for the week of May 16th has been cancelled. The reason is that we had received responses from over 50% of the generators, however, those respondents represented primarily the small contributors. Through a series of telephone calls, it was learned that more generators did want to attend.

Therefore, we have rescheduled a meeting of the generators for June 7, 1983. In order to confirm your company's attendance, we would appreciate your response, by telephone, no later than May 27, 1983. If you have previously responded by postcard, you will have to re-confirm your interest and attendance by telephone. You should ask for Mr. Patrick Ries or Ms. Jodi Anderson at (312) 841-8600.

Very truly yours,

A handwritten signature in cursive script that reads 'Raymond W. Bock'.

Raymond W. Bock
Program Director - Superfund Activities

RWB:mah

A handwritten note in cursive script that reads '8:30 Marriott Oakbrook'.



Avon Products, Inc., 6901 Golf Road, Morton Grove, Illinois 60053

March 14, 1983

Ron Miller
Suffern, New York

SUBJECT: HAZARDOUS WASTE CONTRACTS

Dear Ron,

In response to your memorandum concerning Hazardous Waste Contracts, I have reviewed Avon's "Waste Disposal Agreement" and will implement the use of this form versus the previously used Purchase Agreement.

In reference to the benzoyl peroxide, due to the low content of corrosives, it has been determined to be non-hazardous.

Attached please find the information you requested concerning the Alburn situation. At present generators with drummed waste staged at the Alburn site have not yet been given a date for its removal. I will update you of any changes as they occur.

Should you have any questions or require any further information, please do not hesitate to contact me on extension 5622. Thank you.

Sincerely,


A handwritten signature in dark ink, appearing to read "John Z. Gal".

John Z. Gal
Building & Grounds Supervisor

JZG/mlw

Attachment

cc: J. J. Leon
B. N. Bransky
D. W. Meyers
A. A. Rice

TO: A. A. Rice
FROM: J. Z. Gal 
DATE: March 14, 1983
SUBJECT: ALBURN - WASTE DISPOSAL

The following is a proposal for the removal and disposal of drummed waste presently staged at the Alburn Incinerator.

It should be noted that these are preliminary guidelines, which may be modified as required.

WASTE REMOVAL/DISPOSAL PROCEDURES

1. Identification

- a. Identify Avon's drums.
- b. Provide an accurate drum count.
- c. Identify drum contents.
- d. Correlate staged material to past shipments.

2. Site Access and Drum Removal

- a. Permission from Government Authorities
 - i) Illinois Environmental Protection Agency (IEPA)
 - ii) City of Chicago; Illinois Assistant Attorney General
 - iii) Metropolitan Sanitary District (MSD)
- b. Permission from site owners.
 - i) Professional Construction Co.

3. Scheduling

- a. Approval of site access dates (by governing authorities).
- b. Definition of site access roads and egress.
- c. Identification of staging areas.
- d. Identification of loading areas.

- e. Identification of empty drum disposal staging area.

4. Inspection - Shipping

- a. Defining drum condition.

- i) ship as is
- ii) repack
- iii) bulk load (liquids)

- b. Relabel drums as needed.

- i) hazardous waste
- ii) flammable
- iii) etc.

5. Loading

- a. Loading equipment - drums (to be provided by waste hauler).

- i) front end loader
- ii) fork lift truck (rubber tired).

- b. Loading equipment - liquids (to be provided by waste hauler).

- i) tank truck with vacuum provision
- ii) flatbed or trailer for empty drums

6. Transportation

- a. Licensed waste hauler.
- b. Required shipping documents.

7. Disposal (To Be Determined)

- a. Approved landfill.
- b. Chemical treatment.
- c. Fixation
- d. Incineration (preferred)

8. Safety

- a. Approval of safety equipment (by governing authorities).
- b. Site (to be provided by waste hauler).
 - i) protective clothing
 - ii) hard hats, respirators, etc.
 - iii) fire equipment
 - iv) spill contingency plan
- c. Shipping (to be provided by waste hauler).

9. Documentation

- a. Avon "Waste Disposal Agreement".
- b. Manifests
 - i) IEPA - Special Waste Hauling Manifest
 - ii) Metropolitan Sanitary District (if needed).
- c. Waste Stream Permits (if disposed in Illinois).
- d. Destruction Certificates

TO: A. A. Rice
FROM: J. Z. Gal *JZG*
DATE: March 4, 1983
SUBJECT: ALBURN - DRUM DISPOSAL

A second inspection of the drums staged at the Alburn Incinerator was conducted on March 3, 1983. This consisted of an exact count of all drums, identification and classification of drum content, approximation of quantity of waste per drum, and classification of drum type (please refer to the attached log).

All drums were marked numerically with red paint. These numbers correspond to the attached log.

Merle Smith from Signode Corp. (458-7320) was at the Alburn site at this time. Mr. Smith reportedly has over 300 drums on site. He had some concern of disposal and thus asked of which site Avon plans to use. It was noted that presently Avon has not made any concessions on handling and disposal.

JZG/mlw

WASTE DRUM LOG

Lot 1

| <u>NO.</u> | <u>CONTENTS</u> | <u>CLASS</u> | <u>SIZE</u> | <u>QUANTITY</u> | <u>TYPE</u> |
|------------|-------------------------------------|--------------|-------------|-----------------|-------------|
| 1 | Alcohol Waste Cosmetics (Flammable) | H | 55 | F | STL |
| 2 | " | " | " | " | " |
| 3 | " | " | " | " | " |
| 4 | " | " | " | " | " |
| 5 | " | " | " | " | " |
| 6 | " | " | " | " | " |
| 7 | " | " | " | " | " |
| 8 | " | " | " | " | " |
| 9 | " | " | " | " | " |
| 10 | " | " | " | " | " |
| 11 | " | " | " | " | " |
| 12 | " | " | " | " | " |
| 13 | " | " | " | " | " |
| 14 | " | " | " | " | " |
| 15 | " | " | " | " | " |
| 16 | " | " | " | " | " |
| 17 | " | " | " | " | " |
| 18 | " | " | " | " | " |
| 19 | " | " | " | " | " |
| 20 | " | " | " | " | " |
| 21 | " | " | " | " | " |
| 22 | " | " | " | " | " |

Lot 2

| | | | | | |
|----|---------------|---|----|---|-----|
| 23 | Wash Alcohol | H | 55 | F | STL |
| 24 | " | " | " | " | " |
| 25 | " | " | " | " | " |
| 26 | " | " | " | " | " |
| 27 | Ethyl Acetate | " | " | " | " |
| 28 | Wash Alcohol | " | " | " | " |
| 29 | " | " | " | " | " |

| <u>NO.</u> | <u>CONTENTS</u> | <u>CLASS</u> | <u>SIZE</u> | <u>QUANTITY</u> | <u>TYPE</u> |
|------------|-----------------------------|--------------|-------------|-----------------|-------------|
| 30 | Waste Cosmetics (flammable) | H | 55 | F | STL |
| 31 | Lacquer Base (Nail Polish) | " | 30 | " | " |
| 32 | " | " | " | " | " |
| 33 | " | " | " | " | " |
| 34 | " | " | " | " | " |
| 35 | " | " | " | " | " |
| 36 | " | " | " | " | " |
| 37 | " | " | " | " | " |
| 38 | " | " | " | " | " |
| 39 | " | " | " | " | " |
| 40 | " | " | " | " | " |
| 41 | " | " | " | " | " |
| 42 | " | " | " | " | " |
| 43 | Wash Alcohol | " | " | " | " |
| 44 | " | " | " | " | " |
| 45 | " | " | " | E | " |
| 46 | Waste Cosmetics (flammable) | " | 55 | F | " |
| 47 | Wash Alcohol | " | " | " | " |
| 48 | Waste Cosmetics (flammable) | " | " | " | " |
| 49 | Wash Alcohol | " | " | " | " |
| 50 | Lacquer Base (Nail Polish) | " | 30 | " | " |
| 51 | " | " | " | " | " |
| 52 | Waste Cosmetics (BPO) | NH | 45 | " | FIB |
| 53 | Waste Cosmetics (BPO) | " | " | " | " |
| 54 | " | " | " | " | " |
| 55 | " | " | " | " | " |
| 56 | " | " | " | " | " |
| 57 | " | " | " | " | " |
| 58 | Waste Cosmetics (BPO) | NH | 55 | F | PLA |
| 59 | " | " | " | " | " |
| 60 | " | " | " | " | " |
| 61 | " | " | " | " | " |
| 62 | " | " | " | " | " |
| 63 | " | " | " | " | " |
| 64 | Waste Cosmetics (BPO) | NH | 45 | F | FIB |

| <u>NO.</u> | <u>CONTENTS</u> | <u>CLASS</u> | <u>SIZE</u> | <u>QUANTITY</u> | <u>TYPE</u> |
|------------|-----------------------------|--------------|-------------|-----------------|-------------|
| 65 | Waste Cosmetics (BPO) | NH | 45 | F | FIB |
| 66 | " | " | 55 | ½ | PLA |
| 67 | " | " | " | " | " |
| 68 | " | " | " | ¼ | " |
| 69 | Wash Alcohol | H | 55 | F | STL |
| 70 | " | " | " | " | " |
| 71 | " | " | " | " | " |
| 72 | Waste Cosmetics (BPO) | NH | 45 | " | FIB |
| 73 | " | " | " | " | " |
| 74 | " | " | " | " | " |
| 75 | " | " | " | " | " |
| 76 | " | " | 55 | 1/8 | PLA |
| 77 | Waste Cosmetics (BPO) | NH | 55 | F | PLA |
| 78 | " | NH | 45 | 1/8 | FIB |
| 79 | Waste Cosmetics (flammable) | H | 55 | F | STL |
| 80 | Waste Alcohol | " | 55 | " | " |
| 81 | " | " | " | " | " |
| 82 | " | " | " | " | " |
| 83 | " | " | " | " | " |
| 84 | " | " | " | " | " |
| 85 | " | " | " | 1/8 | " |
| 86 | " | " | " | " | " |
| 87 | " | " | " | F | " |
| 88 | " | " | " | " | " |
| 89 | " | " | " | " | " |
| 90 | " | " | " | " | " |
| 91 | " | " | " | " | " |
| 92 | " | " | " | ½ | " |
| 93 | " | " | " | F | " |
| 94 | " | " | " | " | " |
| 95 | " | " | " | " | " |
| 96 | " | " | " | " | " |
| 97 | " | " | " | " | " |
| 98 | " | " | " | " | " |
| 99 | " | " | " | " | " |
| 100 | Mineral Spirits | " | " | " | " |
| 101 | " | " | " | " | " |

TO: File - Waste Disposal
FROM: J. Z. Gal *JZG*
DATE: March 1, 1983
SUBJECT: ALBURN - DRUM DISPOSAL

On Monday, February 28, 1983, Bill Seltzer (IEPA, Springfield) was contacted in reference to the Alburn site cleanup. Mr. Seltzer pointed out that the scheduling of the Alburn site cleanup will be the responsibility of the present owners, Professional Construction Company. Removal of drums will commence upon submittal of a cleanup procedure to the IEPA by Professional Construction.

Kay Hass, owner of Professional Construction Co. was contacted in an effort to determine the scheduling of said cleanup. A tentative date of March 4, 1983 is set for submittal of the cleanup procedures. Due to this late submittal date, the removal of drums will tentatively not begin before the week of March 14, 1983.

As was previously noted, a preliminary inspection of the Alburn facility was conducted on Tuesday, February 22, 1983. This inspection was mainly to identify Avon's drummed waste. A second inspection is scheduled for Thursday, March 3, 1983 to identify, mark, and note contents of all Avon drums. Recommendations for disposal will be given at that time.

JZG/mlw

TO: File - Waste Disposal
FROM: J. Z. Gal *JZG*
DATE: February 28, 1983
SUBJECT: ALBURN - DRUM DISPOSAL

On February 28, 1983, Don Gallay from the City of Chicago's Environmental Department was contacted in reference to the Alburn Incinerator. Mr. Gallay stated that a certified letter was issued on Thursday, February 24, 1983, to all generators with drummed waste material at the Alburn site. This letter is to state a requirement for the removal of this waste from the site within 30 days.

Mr. Gallay noted that even though the Alburn Incinerator was in operation for over five years, it never had a permit from the City of Chicago, therefore, all waste material on the site is considered illegally deposited and the responsibility of the generator.

JZG/mlw

TO: File - Waste Disposal
FROM: J. Z. Gal *JZG*
DATE: February 28, 1983
SUBJECT: S.C.A. CHEMICAL SERVICES

On Monday, February 28, 1983, Linda Wray, a sales representative from S.C.A. Chemical Services in Stoney Island, was contacted in reference to waste disposal. Ms. Wray explained the disposal process of solids and liquids at the S.C.A. Incinerator, and stated that a Waste Products Survey Form would be mailed to the Avon/Morton Grove facility. Presently, S.C.A. Chemical Services is permitted by the City of Chicago and the State of Illinois (IEPA I.D. No. 031600 AGZ).

Ms. Wray is scheduled to come out to the Morton Grove plant to investigate the possibility of providing waste disposal services in the form of incineration.

JZG/mlw

TO: File - Waste Disposal
FROM: J. Z. Gal *JZG*
DATE: February 24, 1983
SUBJECT: ALBURN - DRUM DISPOSAL


The following Waste Disposal Services have been contacted in an effort to remove the drummed waste which has accumulated at the Altun Incinerator.

1. Commercial Pumping and Incineration
P.O. Box 1798
Highland, IN 46322
312-768-7570
Vic Panaras
2. Environmental Waste Removal, Inc.
S. Broadway
Coal City, IL 60416
815-634-2211
Jim Daggat
3. Environmental Waste Service
330 S. Wells, Room 500
Chicago, IL 60606
312-939-2349
Dan O'Brien
4. Mid-America Environment Service, Ind.
13840 S. Halsted
Riverdale, IL 60627
312-841-7020
Hank Mendoza
5. Mr. Frank, Inc.
201 W. 155th Street
South Holland, IL 60473
312-596-3377
Richard A. Strand

JZG/mlw

Approximately 200 generators were shipping to the Alburn site during the 1982 season. At present, 60-80 generators still have refuse staged at the facility.

The new owners claim that approximately 160 drums of this waste is the property of the Avon/Morton Grove facility. Records show that only 80 drums of waste cosmetics (see attached manifest copies) were shipped to the Alburn site during the 1982 season. Identification and inspection of these drums is scheduled for Tuesday, February 22, 1983.

TO: File - Waste Disposal
FROM: J. Z. Gal 
DATE: February 23, 1983
SUBJECT: ALBURN - DRUM DISPOSAL

On Tuesday, February 22, 1983, a preliminary inspection was conducted of the drummed waste staged at the Alburn Incinerator. Avon's drums were staged in two (2) separate areas, these will be referred to as Lot No. 1 and Lot No. 2. Lot No. 1 is located at the southern portion of the Alburn site, whereas, Lot No. 2 is located at the west end. Descriptions of each area are as follows:

Lot No. 1

This area contains approximately 22 steel drums of hazardous waste cosmetics. Since Avon never sent out a shipment this small (due to shipping costs) to the Alburn site, there is the possibility that this is a partial from a shipment where some of the drums were incinerated. Many times an incinerator uses the low viscosity materials as a fuel, and thus any waste alcohol would have been disposed of.

Lot No. 2

This area contains approximately 80 drums. These are either steel, fiber, or plastic drums. This waste corresponds to a shipment sent to the Alburn site on October 26, 1982. Twenty-three (23) of these drums were listed as non-hazardous waste cosmetics, the remaining were listed as mixtures of alcohol and water (hazardous-flammable).

The amount of drums identified at the incinerator was approximately 102. This does not correspond to the original estimate of 160 drums. Since the original manifests dictate 160 drums, it seems that approximately 58 drums have since been destroyed.

The condition of the site was as expected. There are somewhere between 6000 and 8000 drums staged around the incinerator. All are at ground level (none are double stacked), and aisles are somewhat provided to allow for access. The majority of the drums are in good shape, some leakers are evident. All of Avon's drums are intact.

JZG/mlw

TO: File - Waste Disposal
FROM: J. Z. Gal ~~EC~~
DATE: February 18, 1983
SUBJECT: Alburn, Inc.

Alburn Inc., an Incineration and Chemical Waste Treatment facility in Chicago, Illinois has been shut down by the Illinois Environmental Protection Agency (IEPA). The following suits are presently pending versus the Alburn facility:

1. IEPA vs. Alburn

Involving the permit issued by the state and Alburn's compliance to its requirements. Presently, Alburn has appealed this permit and thus this case is pending in appellate court.

2. People vs. Alburn

Involving the enforcement of the Pollution Control Boards injunction on the Alburn facilities permit (June, 1982).

3. City of Chicago vs. Alburn

The Alburn incinerator was shut down for repairs on September 19, 1982, repairs were pending since this date. The facility continued to receive waste even though an injunction was sighted.

4. City of Chicago vs. Alburn

Involves the claim of the City of Chicago that the Alburn facility did not obtain the proper operating permits.

5. Professional vs. Harris Trust

Professional Construction Co. is the beneficiary of the previously owned Alburn facility, whereas Harris Trust is responsible for the property. Professional Const. as the new owner is claiming the cleanup of this area is the responsibility of the previous owner (January 18, 1983).

**TO BE COMPLETED BY
WASTE GENERATOR**

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0623360
1 7

Authorization Number 1 4 8 3 5 5
8 13

| | | | |
|--|---------------------------------|-------------------------------------|--|
| <u>Avon Products</u> (Company Name) | <u>6901 Golf Rd.</u> Address | <u>312 478 3500</u> Phone Number | <u>0 3 1 1 9 5 0 0 0 7 6</u> Generator Number |
| <u>Morton Grove</u> City | <u>IL.</u> State | <u>60053</u> Zip | <u>I L D 0 0 5 1 4 9 4 1 7</u> EPA Number |

WASTE HAULER(S)

| | | | |
|------------------------------------|--|-------------------------------------|--|
| <u>BFI Shipping</u> Hauler Name | <u>5050 Lake St.</u> Hauler Address | <u>312 345 5551</u> Phone Number | <u>0 1 0 7 0 6 6</u> S.W.H. Registration Number |
| <u>Melrose Park, IL.</u> City | | | <u>I L D 0 9 7 1 7 7 5 0 5</u> EPA Number |

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

| | | | |
|--|-----------------------------------|---------------------------------------|--|
| <u>Alburn, Inc.</u> (Facility Name) | <u>2200 E. 119 St.</u> Address | <u>0 3 1 6 0 0 3 1</u> Site Number | <u>39 46</u> |
| <u>Chicago</u> City | <u>IL.</u> State | <u>60617</u> Zip | <u>I L D 0 0 0 7 2 6 8 5 2</u> EPA Number |

**TO BE COMPLETED BY
WASTE GENERATOR**

WASTE NAME: Alcohol & Water

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Waste, Flammable Liquid, Flammable liquid
UN 1993

D 0 0 1
EPA HW Number

| | | | | | | |
|-----------------------|-----|-------------------|---|--|------------------------|------------|
| WEIGHT FOR D.O.T. USE | LBS | TONS (circle one) | WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL. | QUANTITY OF WASTE DELIVERED: <u>002785</u> | 1 GALLONS (Circle One) | 2 CU. YDS. |
|-----------------------|-----|-------------------|---|--|------------------------|------------|

METHOD OF SHIPMENT (Circle One)

(DRUMS 57)
Number

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

(Authorized Signature)

DATE: 10/24/82

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED.

(1) [Signature]
(Authorized Signature)

DATE: 10/26/82

(2) _____
(Authorized Signature)

DATE: 10/26/82

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES _____ NO X

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

[Signature]
(Authorized Signature)

DATE: 10/26/82

COMMENTS OR SPECIAL INSTRUCTIONS:

**TO BE COMPLETED BY
WASTE GENERATOR**

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0623361
1 7

Authorization Number 148355
B 13

Avon Products 6901 Golf Rd. 312 478 3500 0311950007
(Company Name) Address Phone Number
Morton Grove IL. 60053 ILD005149417
City State Zip EPA Number

WASTE HAULER(S)

BFI Shipping 5050 Lake St. 312 345 5551 0107066
Hauler Name Hauler Address Phone Number S.W.H. Registration Number
Melrose Park IL. 312 345 5551 ILD09177505
Hauler Name Hauler Address Phone Number S.W.H. Registration Number
EPA Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn, Inc. 2200 E. 119 St. 03160031
(Facility Name) Address Site Number
Chicago IL. 60617 ILD000726852
City State Zip Phone Number EPA Number
Alternate (Facility Name) Address Site Number
City State Zip Phone Number EPA Number

**TO BE COMPLETED BY
WASTE GENERATOR**

WASTE NAME: Waste Cosmetics

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW.

SHIPPING DESCRIPTION:

HAZARD CLASS:

Waste Cosmetics

Non- Hazardous

UN1993
UN or NA Number

D001
EPA HW Number

WEIGHT FOR LBS
D.O.T. USE TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 001265 GALLONS (Circle One)
47 52 2 CU. YDS. 53

METHOD OF SHIPMENT (Circle One)

(DRUMS 23)
Number

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 10-26-82

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) Michael J. Sherman
(Authorized Signature)

DATE: 10/26/82
54 59

(2) _____
(Authorized Signature)

DATE: 11/1/82

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES _____ NO X

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

William D. Ellis
(Authorized Signature)

DATE: 10/26/82
60 65

COMMENTS OR SPECIAL INSTRUCTIONS:

N ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 SITE PART - 4 HAULER PART - 5 IEPA PART - 6 GENERATOR

REV. # 4

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 22. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$10,000.00 and an additional civil penalty up to \$1,000.00 and imprisonment up to one year. This form has been approved by the Forms Management Center.



City of Chicago
Jane M. Byrne, Mayor

Department of
Consumer Services
Karen Pettite
Commissioner

City Hall, Room 808
121 North LaSalle Street
Chicago, Illinois 60602
(312) 744-4091

CERTIFIED MAIL RETURNED RECEIPT REQUESTED

February 24, 1983

RE: 2200 E 119th St
Chicago, IL 60617
(Formerly Alburn, Inc)

Avon Products Inc.
6901 Golf Rd
Morton Grove, IL 60053

By virtue of a court order, we have obtained a list of those companies which have illegally deposited waste materials on the above referenced premises in violation of Chapter 17, Artical 6.2 of the Municipal Code of Chicago. The records indicated that your company has approximately 160 drums of liquid waste which are presently stored on the premises.

You are hereby directed to remove the deposited material within 30 days after receipt of this letter. We will require prior notification of the scheduled removal together with planned destination and the name of the hauler. To make the necessary arrangements, you should contact the present occupant of the site, K. Haas, American Incineration Company at 312-346-5570.

An inspection of the drum inventory indicates that some of the drums may be in a deteriorated condition requiring the use of overpacks. Failure to comply with this directive will result in a citation issued to your company for violation of the Municipal Code.

If further information is required you may contact Mr. Don Gallay, Director of Engineering and Enforcement, of this department at 312-744-3210.

Sincerely,

Karen Pettite
Commissioner

KP:DG:lt

cc: USEPA Region V
IEPA
Attorney General, State of Illinois
State Environmental Dept of Generator State of Origin
American Incineration, Inc.

P 464 760 791

Hollander and Hollander

ATTORNEYS AT LAW

33 NORTH LA SALLE STREET - 29TH FLOOR

CHICAGO, ILLINOIS 60602

(312) 346-5570

HOWARD D. HOLLANDER
RICHARD J. HOLLANDER

SYDNEY W. HOLLANDER
(1934-1982)

PETER C. RESNER
GARY P. HOLLANDER

AVON PRODUCTS INC.
6901 GOLF RD
MORTON GROVE IL 60053

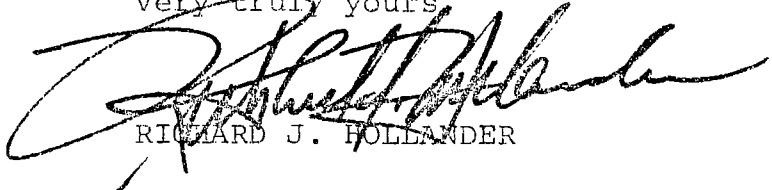
Gentlemen:

We represent American Incineration, Inc. We know you have received a letter from the City of Chicago regarding the removal of your material from the former Alburn site. After many meetings and gathering information, our client has found the only safe, efficient way to handle removal of the large volume of both drum and bulk waste is to have one company handle the clean up from start to conclusion. We are in the process of formulating such a plan with Chemical Waste Management, Inc. The plan contemplates court approval as well as the approval of the State and City regulatory agencies involved. Also proposed are necessary documents for generators to provide an appropriate conclusion to this unfortunate situation. It is our client's intention to submit this plan within the next fourteen (14) days. We believe this plan will not only be safe and efficient, but will also be an economical means of removing and destroying your waste.

We have contacted the City of Chicago regarding their demand to remove your waste within thirty (30) days. The City has agreed to allow adequate time for an orderly solution to this problem.

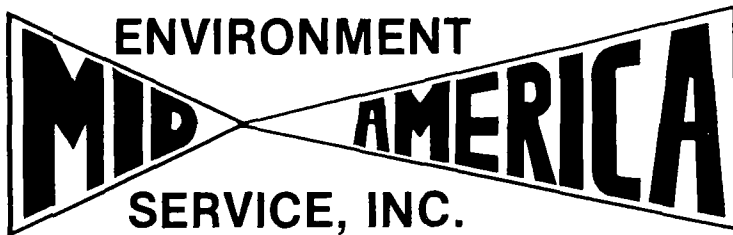
In the past, our client has permitted generators on site to inspect their material; however, this practice will not continue. The potential liability and concern for the safety of your personnel prohibits any further site inspections at this time. We are contemplating a generators meeting around the first of next month and will notify you by mail. Because of the enormous amount of time required returning phone calls, we are asking further communications be restricted to written memos or letters. We are looking forward to your continued cooperation in resolving this difficult problem.

Very truly yours,



RICHARD J. HOLLANDER

RJH/pn



13840 S. Halsted • Riverdale, IL 60627 • (312) 841-7020

February 16, 1983

Mr. John Gal
Avon Products Co.
6901 Golf Road
Morton Grove, IL 60053

Dear Mr. Gal;

As we discussed, we are pleased to submit the following proposal and quotation for your acceptance.

Provide all labor, material, equipment; to identify, segregate, re-label, load, manifest, permit and license, transport and dispose of by fixation of your 55 gal. drummed material now being stored at Alburn, Inc. for a total price of \$48.50 per drum.

If any drum, due to condition of drum, needs to be overpacked for shipment, they will be segregated and bulked on site prior to shipment for an additional \$10.00 per drum. (We do not intend to overpack, as cost of new overpacks is currently \$65.00 per drum.)

Disposal by fixation will be provided by Chem-Met Services, Wyandotte, MI. Upon fixation, the waste is no longer yours and your corporate risk is ended.

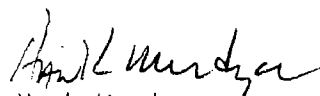
We have existing permits to move your material immediately. If you can, we would suggest removing your wastes before the ground thaws. Prolonged exposure at that site greatly increases your corporate risk.

It will be necessary that someone from your company accompany us when we identify your material; thereby insuring that all of your waste has been removed. We estimate that the entire job should be completed within 3 or 4 days.

We have also enclosed some information about our company and the services that we offer. We are certain that you will find our company to be not only competitive, but responsive and responsible as well.

If you have any questions, please do not hesitate to call us. Thank you for the time and considerate attention you have given us in this matter. We are looking forward to being of service to you.

Sincerely,


Hank Mendoza

HM/nh



Avon Products, Inc., 6901 Golf Road, Morton Grove, Illinois 60053

March 25, 1983

Karen Petitte
Commisioner/Department of Consumer Services
City of Chicago
City Hall, Room 808
121 North Lasalle Street
Chicago, Il 60602

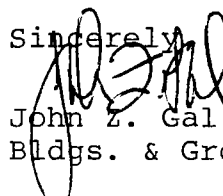
REFERENCE: 2200 E. 119th St.
Chicago, Il 60617
(Formally Alburn, Inc)

This letter is to confirm my conversation with Mr. Don Gallay, Director of Engineering and Enforcement, on Wednesday March 23, 1983 concerning the drummed waste staged at the above referenced site.

Mr. Gallay stated that American Incinerator, Inc., the new site owner, is proposing the removal and disposal of the drummed waste with one waste disposal contractor, and that a letter outlining this information was to be released by American Incinerator during the week of March 21, 1983.

Should you have any questions please do not hesitate to contact me at (312) 470-5622. Thank you.

Sincerely,



John Z. Gal
Bldgs. & Grds. Supervisor

JZG/rmk

cc: D. W. Meyers
A. A. Rice
R. Miller- Suffern, N.Y.

TO: File-Waste Disposal
FROM: J. Z. Gal *JZG*
DATE: March 24, 1983
SUBJECT: Alburn-Drum Disposal

On Friday, March 18, 1983, Gary Braeckel of the Illinois Assistant Attorney General's office was contacted in reference to the drummed waste staged at the Alburn Incinerator.

Mr. Braeckel stated that the existing owner of the previous Alburn Incinerator, American Incinerator, has submitted a proposal to the city for the removal of the drummed waste from the Alburn site.

This proposal consists of utilizing one waste disposal contractor for the removal and disposal of all the waste at the Alburn site, thus making the generator harmless and free of liability. The contractor recommended for this waste removal is Chemical Waste Management Inc.

Mr. Braeckel pointed out that due to the delays encountered by American Incinerator, the 30 day compliance time set for the removal of the drummed waste will probably be lifted. At present no decision had been made as to the acceptance of this proposal.

cc: A. A. Rice

TO: A. A. Rice
FROM: J. Z. Gal *JZG*
DATE: March 23, 1983
SUBJECT: ALBURN DRUM DISPOSAL

On Wednesday, March 23, 1983, Cliff Gould of the IEPA in Maywood, Illinois was contacted in order to review the drum count at the Alburn Incinerator. Mr. Gould pointed out that he no longer had the original manifests from the waste shipped to the Alburn site. These manifests were returned to the new site owner, American Incinerator. Mr. Gould suggested contacting Don Gallay from the City of Chicago, Department of Consumer Services, in order to review this drum count discrepancy.

Mr. Don Gallay pointed out that since American Incineration, Inc., is proposing to remove all waste using one waste hauling contractor and that there were some difficulties with scheduling, the 30 day waste removal deadline given to the generators by the Department of Consumer Services has been lifted. As to the error in drum count, Mr. Gallay recommended dealing directly with American Incinerator, since they had issued the original drum count.

Rich Hollander, of American Incinerators, Inc. was contacted later that morning. Mr. Hollander would not give out any information pertaining to the drummed waste staged at the Alburn site. Instead, Mr. Hollander requested that a letter be mailed to himself at which time he would address the situation.

Presently there is still the difficulty in accounting for all of Avon's drummed waste at the Alburn site. A letter documenting the conversation with Mr. Gallay will be drafted. Also, a letter will be sent to Kay Haas, the owner of American Incinerator, requesting information dealing with the drum count.

JZG/mlw

cc: D. W. Meyers

R. Miller - Suffern



ALBURN SEV-80 - 160 LBS (MIXED)

| | | 1 | 2 | 3 | 4 | 5 |
|----|----------------------|---------------|-------------|--------------|------------------|------------------|
| | | <u>MID-AM</u> | <u>CPFI</u> | <u>CH-CL</u> | <u>KE FRANKS</u> | <u>ENE</u> |
| 1 | <u>sch</u> | 104/10 | H # 60 | | 13-80/100 | |
| 2 | | | | | | |
| 3 | | | lincl. | | | |
| 4 | | | TRAC. | | | <u>Colcord</u> |
| 5 | | | 60.25 | perm. ting | | |
| 6 | <u>LWD</u> | 49.50 60 | PUMP | | | |
| 7 | | | | rec | | |
| 8 | <u>Kentucky</u> | | TRANS | LOT | | |
| 9 | <u>(incinerator)</u> | | #180.00 | sludge | | |
| 10 | | | | | | |
| 11 | <u>CHEM- HET</u> | 4350 | NH # 27/dr | | | <u>Waste</u> |
| 12 | | | #170.00 | | | |
| 13 | <u>(no alv. a)</u> | (#5/sum) | | | | |
| 14 | | | | | | |
| 15 | <u>MCKESSON</u> | 54/100 | | | | <u>Waste</u> |
| 16 | | | | | | #20-25 |
| 17 | | | | | | Heaver # 5-15 |
| 18 | | | | | | |
| 19 | | | | | | |
| 20 | | | | | | |
| 21 | <u>sch</u> | | | | | <u>Need 100</u> |
| 22 | | | | | | <u>2500</u> |
| 23 | <u>Colcord</u> | | | | | |
| 24 | <u>ex - in line</u> | | | | | |
| 25 | <u>alv. a)</u> | | | | | |
| 26 | | | | | | |
| 27 | | | | | | |
| 28 | <u>Do not use</u> | | | | | |
| 29 | <u>Parran</u> | | | | | <u>Emergency</u> |
| 30 | <u>Landfill</u> | | | | | <u>Permit</u> |
| 31 | | | | | | |
| 32 | <u>Reca 2</u> | | | | | <u>need</u> |
| 33 | | | | | | <u>state</u> |
| 34 | <u>Fed 2 nois</u> | | | | | <u>stream</u> |
| 35 | | | | | | <u>permits</u> |
| 36 | | | | | | |
| 37 | <u>Alburn 2</u> | | | | | |
| 38 | <u>(4) lawyers</u> | | | | | |
| 39 | | | | | | |
| 40 | | | | | | |